

FILED

DEC 11 2013

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 RICHARD TAYLOR,)
)
 Defendant.)
)
)
)
)

4:13CR508 CDP/TCM

INDICTMENT

COUNT ONE

FOOD STAMP FRAUD

The Grand Jury charges that:

Background of the Supplemental Nutrition Assistance Program (SNAP)

1. The United States Department of Agriculture (USDA) administers a program called the Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program. During all relevant times alleged herein the Food Stamp Program and SNAP helped qualifying individuals and families buy food.

2. SNAP benefits are typically issued to certified recipients and encoded electronically onto Electronic Benefits Transfer cards (hereinafter referred to as "EBT cards"). The Food and Nutrition Service (hereinafter "FNS"), an Agency of the USDA, administers the SNAP.

FNS delegates to individual States the task of determining eligibility and certifying individual SNAP recipient's eligibility. Issued on a monthly basis to eligible applicants, SNAP benefits permit the recipient to purchase only eligible food items using EBT cards at FNS authorized retailers. The FNS authorizes certain grocery retail stores to accept SNAP EBT cards from authorized recipients for eligible food items. The SNAP EBT card system is a computer-based system through which the SNAP benefit authorization is received from a central computer through the "point-of-sale" (POS) terminal located at each individual retailer. When the recipient presents the EBT card to the retailer to pay for eligible food items, the retailer uses the POS, which electronically withdraws, or debits available SNAP benefits from the recipient's EBT card and account. The grocery retailer later receives a bank deposit credit for the value of the transaction in the retailer's designated business bank account. Payments to the grocery retailer are made through the FNS system and are paid by the United States through USDA appropriated funds.

3. Individuals who have been convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance are ineligible for EBT food stamp benefits.

4. A potential SNAP/food stamp recipient must disclose in an "Application for Food Stamp Benefits" or in an interview with the Missouri Department of Social Services whether they have been convicted of a drug offense after August 22, 1996.

Defendant's Felony Drug Conviction and False Statements

5. On or about March 19, 1999, defendant Richard Taylor (defendant) was convicted in the state of Florida, 18th Judicial Circuit Court in Brevard County, City of Viera, of a felony conviction related to illegal possession, use, or distribution of a controlled substance, to wit, the charge of Possession of Cocaine less than 28 grams, in case number 051999CF006429AXXXXX.

6. On or about April 16, 2008, within the Eastern District of Missouri, defendant applied for SNAP/food stamp benefits in an interview with the Missouri Department of Social Services. In his interview, defendant falsely stated that he had not been convicted in a federal or state court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance.

7. In or about April 2008, based in part upon defendant's false statement, defendant was approved for SNAP/food stamp benefits and began to receive these benefits.

8. On or about July 9, 2011 and July 21, 2011, within the Eastern District of Missouri, defendant applied for SNAP/food stamp benefits with the Missouri Department of Social Services by completing an Application for Food Stamp Benefits. In both applications, defendant falsely stated that he had not been convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance.

9. In or about July 2011, based in part upon defendant's false statements, defendant was approved to continue to receive SNAP/food stamp benefits and he received those benefits.

10. From about April 2008 to May 2012, defendant redeemed approximately \$9,240.00 in SNAP/food stamp benefits.

11. From in or about April 2008 to in or about May 2012, within the Eastern District of

Missouri, the defendant, Richard Taylor, knowingly and intentionally used, transferred, acquired and possessed SNAP/food stamp benefits of a value of \$5,000 or more, in a manner contrary to Chapter 51 of Title 7, United States Code, in that: defendant was not eligible to obtain SNAP/food stamp benefits because defendant was convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance and acquired and redeemed approximately \$9,240.00 of SNAP/food stamp benefits.

In violation of Title 7, United States Code, Section 2024(b), and Title 18, United States Code, Section 2.

COUNT II

FALSE STATEMENT

The Grand Jury further charges that:

1. The Grand Jury re-alleges as if fully set forth herein, all of the allegations contained in paragraphs 1-10 of Count I.
2. On or about July 9, 2011, and July 11, 2011, in the Eastern District of Missouri, and elsewhere,

RICHARD TAYLOR,

did knowingly and intentionally make a false statement of material fact relating to a matter within the jurisdiction of the United States, to wit: he stated in the Application for Food Stamp Benefits, that, defendant had not been convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance.

In violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

FOREPERSON

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